

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SARA S. ECHEVARRIA,)	
)	
Plaintiff,)	C.A. NO. 05-284 GMS
)	
v.)	
)	
U-HAUL INTERNATIONAL, INC.,)	TRIAL BY JURY OF
ROGER MAYFIELD, and)	TWELVE DEMANDED
NATIONWIDE GENERAL INSURANCE)	
COMPANY,)	
)	
Defendants.)	

**DEFENDANT, NATIONWIDE GENERAL INSURANCE COMPANY'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO U-HAUL INTERNATIONAL, INC.**

COMES NOW the Defendant, Nationwide General Insurance Company, by and through its attorneys, Robert J. Leoni and Morgan Shelsby & Leoni, and request that the Plaintiff produce and permit the Defendant to inspect, copy and photograph all documents and things in the Plaintiff's possession, custody or control which embody, refer to, or relate to in any way the following subject, other than written materials prepared in anticipation of litigation or for trial:

1. A complete certified copy of any insurance policy covering the vehicle and/or the trailer which was rented to Roger Mayfield and involved in the accident identified in the Complaint filed in this action and operated by Roger Mayfield.
2. A complete copy of any and all documents constituting the agreement for the rental of the vehicle and/or trailer which were involved in the accident identified in

the Complaint including but not limited to all rental agreements and contracts and operated by Roger Mayfield.

3. All photographs of the vehicle, the trailer, and the coupling system or mechanism for the vehicle and the trailer which were involved in the accident identified in the Complaint and operated by Roger Mayfield.

4. The actual coupler or other mechanism connecting the trailer to the vehicle operated by Roger Mayfield as identified in the Complaint.

MORGAN SHELBY & LEONI

/s/ Robert J. Leoni

ROBERT J. LEONI, I.D. #2888

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221 Main Street
Stanton, DE 19804
(302) 995-6210

DATE: March 1, 2006

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COMPANY,)	
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NOTICE OF SERVICE

I **HEREBY CERTIFY** on this 1st day of March, 2006, two copies of the foregoing Defendant, Nationwide General Insurance Company's First Request For Production of Documents Directed to U-Haul International, Inc. was served via e-filing to:

Roger D. Landon, Esquire
MURPHY SPADARO & LANDON
1011 Centre Road, Suite 210
Wilmington, DE 19805

Steven L. Caponi, Esquire
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MORGAN SHELBY & LEONI

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